

From: Jeff and Elaine Smith
June 30th, 2006

To: Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W) Re: Business Opportunity Rule, R511993 600 Pennsylvania Avenue, NW Washington, DC 20580 RE: Business Opportunity Rule, R511993
<https://secure.commentworks.com/ftc-bizopNPR/>

Dear Sir or Madam:

We are very concerned about the proposed Business Opportunity Rule R511993, in that it could substantially prevent us from doing business. We conduct business in an extremely ethical and proper way, which preserves and promotes the interests of the public with whom we deal.

This rule would seriously impact our livelihood and provide no relative benefit to the people with whom we deal.

In its present form, the proposed rule will make it very difficult, if not impossible, for me to sell the Sunrider® products.

One problem is the **7-day cooling-off period** to enroll new Distributors. Sunrider's Starter Pack costs only \$140, and is not even a mandatory purchase in order to become an Independent Sunrider Distributor. People buy many other items that cost much more than that and they do not have to wait ANY PERIOD AT ALL.

This waiting period therefore gives the impression to purchasers that there might be something wrong with the plan or product. This kind of rule usually applies to areas of commerce where people can expect to be misled and possibly, ripped off. That does not - and cannot happen - in what we do. As well, there is Sunrider's exemplary 60-day return policy which includes the Sunrider® Starter Pack as well as products. Sunrider also has a 90% buyback policy for former Distributors applicable to all products purchased within the last twelve months.

Proposed within the rule/s is the **onerous administrative requirement** for Distributors to keep detailed records, not only when we first speak to anyone about our business, but then having to send numerous reports to Sunrider International. This would interfere substantially with our ability to offer the business as a potential livelihood for our associates.

Also, the proposed rule, in calling for the **release of any information regarding certain lawsuits** and a **disclosure of 10 previous transactions**, is very ill-considered. Lawsuits can be frivolous and unsuccessful, which the proposal in no way takes no account. Such history in other areas of commerce are not seen as requiring of reporting. It is unfair that we should be required to do so.

On the disclosure of previous transactions, no customer of mine should have to risk their privacy

in any way through my having to comply with such a rule. The fact that we would have to report all details of our dealings to another authority means that they will have to either take that risk, or go elsewhere to avoid that risk. We would undoubtedly lose business.

In this day and age, this proposal would be a substantial restraint of our ability to run our business, and therefore we strongly and without exception or hesitation, object to the proposal/s.

Our livelihood is the Sunrider business and has been so for 17 years during which we have conducted it lawfully, respectfully and without ever having caused anyone any harm at any time.

Overall, and with all factors considered, he proposed rules that will likely cut it to shreds.

While we appreciate the work of the FTC to protect consumers, but the rule as proposed is a scandalous interference. Please withdraw the proposal.

Thank you.

Sincerely,

Jeff and Elaine Smith